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October 11, 2013

Via ECF/CM

Hon. Judge Kimba M. Wood
United States District Court
for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Ryan et al. (McCorrison)*, 12 Cr. 384

Dear Judge Wood:

I represent Mark McCorrison, a defendant in the above-referenced case currently pending before this Court, under the terms of the Criminal Justice Act, 18 U.S.C. §3006A, and make this letter-motion to modify the terms of Mr. McCorrison's pre-trial release for the limited purpose of allowing him to travel to Sanibel Island, Florida for a conference from November 16 - 23, 2013.

Mr. McCorrison initially appeared in magistrate court on March 21, 2012, where he was released subject to conditions including a personal recognizance bond of \$100,000, travel restrictions to the Southern and Eastern Districts of New York and the District of Connecticut, where he resides, as well as the surrender of travel documents and regular pre-trial supervision. On September 18, 2013, Mr. McCorrison entered a plea of guilty and he is currently awaiting sentencing, which is scheduled for December 18, 2013 before this Court.

For over a year and a half, Mr. McCorrison has successfully complied with all of the terms of his pre-trial supervision. In addition, he has been gainfully employed working, among other jobs, as an umpire and coach for the United States Specialty Sports Association ("USSSA"), which is a multi-sport athletic organization founded in 1968 and currently comprising over 3.7 million participants in thirteen different nationally sanctioned sports, including fastpitch softball, which is what Mr. McCorrison umpires.

The head of the USSSA for the New England Region, Mr. Jon Brandt, has invited Mr. McCorrison to attend the USSSA national convention on Sanibel Island, Florida, from November 16 - 23, 2013. Mr. McCorrison would travel with Mr. Brandt from Hartford, Connecticut to Ft. Meyers, Florida on Southwest Airlines Flight Number 3208 departing Saturday November 16, 2013 at 7:00 am and returning from Ft. Meyers to Hartford on Southwest Airlines Flight Number 1200 departing Saturday November 23, 2013 at 6:40 pm. The conference will be held at the Sanibel Harbour Marriot Resort & Spa and Mr. McCorrison would stay at that hotel for all seven nights.

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October 11, 2013

Page 2

Attending the conference will allow Mr. McCorrison to make meaningful contacts with leaders of the USSSA, an organization in which he has thrived and that has allowed him to find gainful employment in the sports field, providing him structure and discipline during the course of this difficult time in his life. I have communicated with Assistant United States Attorney Micah Smith as well as Pre-Trial Supervision Officer Greg Campos, who is supervising Mr. McCorrison out of the District of Connecticut, and both have told me that they do not object to Mr. McCorrison traveling to Florida for purposes of attending the USSSA conference.

I therefore respectfully request that this Court modify the terms of Mr. McCorrison's pre-trial release, allowing him to travel from the District of Connecticut to Sanibel Island Florida in order to participate in the 2013 national conference of the United States Specialty Sports Association.

Respectfully,



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cc (via email): Micah Smith, Assistant United States Attorney, Southern District of New York